

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

CEATS, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 6:10-cv-120 LED
v.	)	
	)	
CONTINENTAL AIRLINES, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

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**CEATS' ANSWER TO US AIRWAYS' COUNTERCLAIMS**

CEATS, Inc. ("CEATS") respectfully submits this Answer to the Counterclaims filed by US Airways, Inc. ("US Airways"). US Airways' Counterclaims are meritless. CEATS' patents are valid and enforceable. In response to the specific allegations in the counterclaims, CEATS states as follows:

1. CEATS is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 of US Airways' Counterclaims and therefore denies them on that basis.
2. The allegation of Paragraph 84 of US Airways' Counterclaims is admitted.
3. The allegations of Paragraph 85 of US Airways' Counterclaims state legal conclusions for which no answer is required.
4. The allegations of Paragraph 86 of US Airways' Counterclaims state legal conclusions for which no answer is required.

5. The allegation of Paragraph 87 is admitted as to there being an actual controversy regarding issues of US Airways' infringement of the '361, '866, '870, '728, '729, and '663 patents. Except as so admitted, the allegations of Paragraph 87 are denied as to the merits of US Airways' Counterclaims.

6. The allegation of Paragraph 88 is admitted as to US Airways' seeking a declaration for the '361, '866, '870, '728, '729, and '663 patents. Except as so admitted, the allegations of Paragraph 88 are denied as to the merits of US Airways' Counterclaims.

7. The allegation of Paragraph 89 is admitted as to there being an actual controversy regarding issues of validity for the '361, '866, '870, '728, '729, and '663 patents. Except as so admitted, the allegations of Paragraph 89 are denied as to the merits of US Airways' Counterclaims.

8. The allegation of Paragraph 90 is admitted as to US Airways' seeking a declaration for the '361, '866, '870, '728, '729, and '663 patents. Except as so admitted, the allegations of Paragraph 90 are denied as to the merits of US Airways' Counterclaims.

CEATS denies US Airways' Prayer for Relief in its entirety. US Airways' is not entitled to any relief and should take nothing.

Respectfully submitted,

/s/ Michael S. Nadel

Fay E. Morisseau (Texas Bar. No. 14460750)  
McDERMOTT WILL & EMERY LLP  
1000 Louisiana Street, Suite 3900  
Houston, Texas 77002  
(713) 653-1700

Daniel R. Foster  
Christopher D. Bright  
McDERMOTT WILL & EMERY LLP  
18191 Von Karman Avenue, Suite 500  
Irvine, California 92612  
(949) 757-7103

Michael S. Nadel  
Rebecca A.H. Watson  
McDERMOTT WILL & EMERY LLP  
600 Thirteenth Street, N.W.  
Washington, D.C. 20005  
(202) 756-8000

J. Thad Heartfield, Jr.  
Texas Bar No. 09346800  
Law Offices of J. Thad Heartfield  
2195 Dowlen Road  
Beaumont, TX 77706  
Tel: 409.866.3318 (ext. 1)  
Fax: 409.866.5789  
Email: thad@jth-law.com

*Attorney for Plaintiff CEATS, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2010, the foregoing was electronically filed with the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Michael S. Nadel

Michael S. Nadel